

1 James J. Pisanelli (SBN 4027)
2 Robert A. Ryan (SBN 12084)
3 PISANELLI BICE PLLC
4 400 South 7th Street, Suite 300
5 Las Vegas, NV 89101
6 Telephone: +1 702 214 2100
7 Facsimile: +1 701 214 2101

8 Farah Tabibkhoei (*Pro Hac Vice App. to be filed*)
9 REED SMITH LLP
10 355 South Grand Avenue, Suite 2900
11 Los Angeles, CA 90071
12 Telephone: +1 213 457 8000
13 Facsimile: +1 213 457 8080

14 Martin J. Bishop (*Pro Hac Vice App. to be filed*)
15 REED SMITH LLP
16 10 South Wacker Drive, 40th Floor
17 Chicago, IL 60606
18 Telephone: +1 312 207 1000
19 Facsimile: +1 312 207 6400

20 *Attorneys for Defendant*
21 *Arizona Physicians IPA, Inc.*

22 UNITED STATES DISTRICT COURT
23 DISTRICT OF NEVADA

24 SUNRISE HOSPITAL AND MEDICAL
25 CENTER, LLC,

26 Plaintiff,

27 vs.

28 ARIZONA PHYSICIANS IPA, INC.,

Defendants.

Case No.: 2:18-cv-00341-JCM-GWF

**STIPULATION REGARDING
EXTENSION OF TIME TO FILE
VERIFIED PETITION AND
DESIGNATION OF LOCAL COUNSEL;
[PROPOSED] ORDER**

Current Deadline: April 9, 2018
Proposed Deadline: April 16, 2018

STIPULATION

29 Plaintiff Sunrise Hospital and Medical Center, LLC and Defendant Arizona Physicians IPA,
30 Inc., by and through their respective attorneys of record, stipulate and agree as follows:

1 WHEREAS the Court provided notice to Defendant's counsel to file a Verified Petition and
2 Designation of Local Counsel by April 9, 2018 [Doc. 8];

3 WHEREAS Defendant has been diligent in completing the Verified Petition and Designation
4 of Local Counsel and has requested the applicable Certificates of Good Standing, which are
5 outstanding;

6 WHEREAS Defendant expects to receive all of the applicable Certificates of Good Standing
7 for Defendant's counsel on or before April 16, 2018; and

8 WHEREAS Defendant has not previously requested an extension for file a Verified Petition
9 and Designation of Local Counsel.

10 **IT IS HEREBY STIPULATED THAT:**

11 Defendant Arizona Physicians IPA, Inc. shall have until April 16, 2018 to file the Verified
12 Petition and Designation Of Local Counsel.

13 Dated: April 5, 2018

14 BAILEY KENNEDY

15 By: /s/ Joshua M. Dickey
16 Joshua M. Dickey (SBN 6621)
17 8984 Spanish Ridge Avenue
18 Las Vegas, NV 89148

19 *Attorneys for Plaintiff
Sunrise Hospital and Medical Center,
LLC*

14 DATED: April 5, 2018

15 PISANELLI BICE PLLC

16 By /s/ Robert A. Ryan
17 James J. Pisanelli (SBN 4027)
18 Robert A. Ryan (SBN 12084)
19 400 South 7th Street, Suite 300
20 Las Vegas, NV 89101

21 *Attorneys for Defendant
Arizona Physicians IPA, Inc.*

22 **IT IS SO ORDERED.**

23 DATED: 4-6-2018



24 Judge of the United States District Court